

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6340-Cr-HURLEY/VITUNAC

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SALOMON RAMIREZ-ESCALANTE,

Defendant.

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DEFENDANT'S UNOPPOSED REQUEST FOR A PRE-PLEA PSI

Defendant, Salomon Ramirez-Escalante, through undersigned counsel, files the following request for an order directing United States Probation to conduct a pre-plea psi in the instant case. As grounds for this request, Defendant states:

1. Defendant is charged with the offense of making a false statement on a passport application. It is anticipated that the case will be resolved by way of a plea.
2. There is no indication that Defendant has any prior criminal record, therefore his sentencing guideline range will be 0-6 months imprisonment.
4. Defendant, a Colombian national is in this country on an expired visa. It is anticipated that at the conclusion of the case he will be deported back to Colombia.
5. In order to expedite the resolution of this case, it is requested that a pre-plea psi be done allowing Defendant to plead and be sentenced at the same time.
6. Undersigned counsel has conferred with Assistant United States Attorney Scott

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Behnke who has no objection to the instant request.

WHEREFORE, for the reasons stated above, Defendant requests this Court enter an order directing United States Probation to prepare a pre-plea psi in this case, such report due within forty-five (45) days of the granting of the instant motion.

Respectfully submitted,

KATHLEEN M. WILLIAMS
FEDERAL PUBLIC DEFENDER

By: Robin C. Rosen-Evans

Robin C. Rosen-Evans
Assistant
Federal Public Defender
Attorney for Defendant
Florida Bar No. 438820
400 Australian Ave., Suite 300
West Palm Beach, Florida 33401
Tel:(561) 833-6288/Fax:833-0368

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed/delivered this 18th day of April, 2001, to Assistant United States Attorney Scott Behnke, 500 E. Broward Blvd., 7th Floor, Ft. Lauderdale, FL 33394.

Robin C. Rosen-Evans
Robin C. Rosen-Evans